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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

YURIDIA CHAVEZ-HERRERA

Plaintiff,

vs.

SHAMROCK FOODS COMPANY, an Arizona
foreign corporation; DOE I EMPLOYEE,
DOES II through X, and ROE
CORPORATIONS I through X, inclusive,

Defendants.

Case No. 2:19-cv-01327-GMN-BNW

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(FIRST REQUEST)**

Pursuant to LR 6-1 and LR 26-2, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the Discovery Deadlines in the above-captioned case for ninety (90) days as set forth below.

A. Discovery Completed to Date:

1. The FRCP 26(f) Conference was held 8/27/2019;
2. Plaintiff produced her initial FRCP 16.1 disclosures on September 4, 2019;
3. Defendants produced its initial FRCP 16.1 disclosures on September 18, 2019;
4. Plaintiff propounded its First Set of Interrogatories and First Set of Requests for Production of Documents to Defendant Shamrock on 11/7/19;

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B. Discovery Remaining to Be Completed:

1. Defendant Shamrock needs to provide written discovery requests to the Plaintiff;
2. Defendant needs to propound written discovery to the Plaintiff;
3. Doe I Employee needs to be substituted;
4. Deposition of Plaintiff;
5. Deposition of Doe I Employee;
6. Deposition of Person(s) Most Knowledgeable of Defendant;
7. Disclosure of initial experts;
8. Disclosure of rebuttal experts;
9. Depositions of each party's experts;
10. Any other discovery which may be determined as relevant and necessary by the parties.

C. Reasons for Request for Extension of Discovery Deadlines

The parties request this extension for multiple reasons. The Plaintiff is still treating and the parties need additional time to fully access her treatment and future treatment needed. Further, Plaintiff is attempting to substitute the Doe I Employee and will need additional time to propound written discovery and take his/her deposition. Lastly, given the upcoming holidays, the parties need additional time to retain experts. Accordingly, the parties stipulate to the following proposed discovery order.

D. Proposed Schedule for Completing Discovery

EVENT DEADLINE	CURRENT DATE	PROPOSED DATE
Last date to complete discovery:	2/5/2020	05/05/2020
Last date to amend pleadings and add parties:	11/7/2019	02/05/2020
Last date to file interim status report:	12/06/2019	03/05/2020



1	Last date to disclose experts pursuant to Fed. R. Civ. P. 26(a)(2):	12/06/2019	03/05/2020
2			
3	Last date to disclose rebuttal experts:	01/16/2020	04/15/2020
4	Last date to file dispositive motions	03/06/2020	06/04/2020
5	Last date to file joint pretrial order:	04/06/2020	07/06/2020

6 (In the event dispositive motions are filed, the date
7 for filing the joint pretrial order shall be suspended
8 until 30 days after the decision of the dispositive
9 motions.)

9 E. Current trial date

10 A Trial date has not yet been scheduled.

11 WHEREFORE, the parties respectfully request this Honorable Court adopt the foregoing
12 stipulation of the parties which will result in the new deadlines and trial setting.

13 DATED this 12th day of November, 2019.

DATED this 12th day of November, 2019.

14 BENSON & BINGHAM

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Attorney for Defendant

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21 **IT IS SO ORDERED**

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23 **DATED: November 18, 2019**

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26 **BRENDA WEKSLER**

27 **UNITED STATES MAGISTRATE JUDGE**

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